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Presentment Date: February 25, 2019
Presentment Time: 12:00 p.m. ET
Objection Date: February 20, 2019
Objection Time: 4:00 p.m. ET

Counsel to the Relativity Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| ----- | X | |
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| In re: | : | Chapter 11 |
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| RELATIVITY MEDIA, LLC, et al., ¹ | : | Case No. 18-11358 (MEW) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
| ----- | X | |

**NOTICE OF PRESENTMENT OF ORDER PURSUANT TO
LOCAL BANKRUPTCY RULE 3021-1(a) APPROVING TIMETABLE
FOR SUBSTANTIAL CONSUMMATION OF SECOND AMENDED
CHAPTER 11 PLAN OF LIQUIDATION AND ENTRY OF FINAL DECREE**

PLEASE TAKE NOTICE that, pursuant to Rule 3021-1(a) of the Local Bankruptcy Rules for the Southern District of New York, the Trustee of the Relativity Liquidating Trust will present the attached proposed order (the “**Proposed Order**”) approving a timetable for achieving substantial consummation of the *Debtors’ and the Creditors’ Committee’s Second Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* (the “**Plan**”) [Docket No. 633] dated December 13, 2018, and confirmed on January 31, 2019, and entry of a final decree closing these

¹ Each of the debtors in the above-captioned, jointly administered chapter 11 cases and their respective tax identification numbers are set forth (a) in the *Order (A) Authorizing the Joint Administration of their Chapter 11 Cases and (B) Waiving Requirements of Section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n)* [Docket No. 5] and (b) at <https://cases.primeclerk.com/relativity>. The location of Relativity Media, LLC’s corporate headquarters and the debtors’ service address is: 9242 Beverly Blvd. #300, Beverly Hills, CA 90210.

chapter 11 cases, to the Honorable Michael E. Wiles, United States Bankruptcy Judge, for signature in his chambers at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **February 25, 2019, at 12:00 noon (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the approval of the Proposed Order must: (i) be made in writing; (ii) state with particularity the grounds therefor; (iii) be filed with the Bankruptcy Court (with a copy to the Judge's chambers); and (iv) be served upon: (a) the Relativity Liquidating Trust (the "**Trust**"), c/o DriveTrain LLC, 630 Third Avenue, 21st Floor, New York, NY 10017 (Attn: Tim Daileader, tdaileader@drivetrainllc.com); (b) counsel for the Trust, Robins Kaplan LLP, 2049 Century Park East, Suite 3400, Los Angeles, CA 90067 (Attn: Scott F. Gautier and Michael T. Delaney, sgautier@robinskaplan.com and mdelaney@robinskaplan.com); (c) Relativity Media, LLC and its debtor affiliates (collectively, the "**Debtors**"), c/o M-III Partners, LP, 130 W 42nd Street, 17th Floor, New York, NY 10036-9242 (Attn: Colin Adams, cadams@miiipartners.com); (d) counsel for the Debtors, Winston & Strawn LLP, 200 Park Avenue, New York, NY 10166 (Attn: Daniel J. McGuire and Carrie V. Hardman, dmcguire@winston.com and chardman@winston.com); (e) the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes and Benjamin Higgins, greg.zipes@usdoj.gov and benjamin.higgins@usdoj.gov); and (f) counsel for the DIP Lender and the Prepetition Secured Note Lender, Schulte Roth & Zabel LLP, 919 Third Avenue, New York, NY 10022 (Attn: Adam C. Harris and Kristine Manoukian, adam.harris@srz.com and kristine.manoukian@srz.com), so as to be filed and received no later than **4:00 p.m. (prevailing Eastern Time) on February 20, 2019 (the "Objection Deadline")**.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are received by the Objection Deadline, the Court may enter the Proposed Order without further notice or a hearing. If an objection is filed, you may be notified of a hearing to consider the requested relief.

Dated: February 14, 2019
Los Angeles, California

Respectfully submitted,

ROBINS KAPLAN LLP

By: /s/ Scott F. Gautier

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Michael T. Delaney (admitted *Pro Hac Vice*)

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Counsel to the Relativity Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: Chapter 11
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RELATIVITY MEDIA, LLC, et al.,¹ Case No. 18-11358 (MEW)
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Debtors. (Jointly Administered)
:
----- X

**ORDER PURSUANT TO LOCAL BANKRUPTCY RULE 3021-1(a)
APPROVING TIMETABLE FOR SUBSTANTIAL CONSUMMATION
OF SECOND AMENDED CHAPTER 11 PLAN OF LIQUIDATION
AND ENTRY OF FINAL DECREE**

This Court having entered an order, dated January 31, 2019 [Docket No. 689] (the “**Confirmation Order**”) confirming the *Debtors’ and the Creditors’ Committee’s Second Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* (the “**Plan**”) [Docket No. 633] dated December 13, 2018;² and Rule 3021-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”) requiring the proponents of the Plan or other responsible person under the Plan to submit an order containing a timetable with the steps proposed for achieving substantial consummation of the Plan and entry of a final decree closing the above-captioned bankruptcy cases (collectively, the “**Chapter 11 Cases**”) of Relativity Media, LLC and its debtor affiliates (collectively, the “**Debtors**”); and the trustee (the “**Trustee**”) of the Relativity Liquidating Trust (the “**Trust**”), as such responsible person, having made a proposal of such

¹ Each of the debtors in the above-captioned, jointly administered chapter 11 cases and their respective tax identification numbers are set forth (a) in the *Order (A) Authorizing the Joint Administration of their Chapter 11 Cases and (B) Waiving Requirements of Section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n)* [Docket No. 5] and (b) at <https://cases.primeclerk.com/relativity>. The location of Relativity Media, LLC’s corporate headquarters and the debtors’ service address is: 9242 Beverly Blvd. #300, Beverly Hills, CA 90210.

² Unless otherwise defined herein, capitalized terms shall have the meaning ascribed to them in the Plan and/or Confirmation Order, as applicable.

timetable, by notice of presentment dated February 14, 2019; and, after due notice, there being no objections to the requested relief; and this Court having determined that the timetable set forth in this Order is an appropriate timetable for achieving substantial consummation of the Plan and entry of a final decree closing the Chapter 11 Cases; and, after due deliberation thereon, finding good and sufficient cause therefor, it is hereby:

ORDERED, that:

1. The following timetable for achieving substantial consummation of the Plan and entry of a final decree closing the Chapter 11 Cases is approved, without prejudice to the Trustee's right to revise such timetable as set forth in Local Rule 3021-1(b):

- a. *Substantial Consummation of the Plan.* Pursuant to Section XI.L. of the Plan and Paragraph 30 of the Confirmation Order, on the Effective Date, the Plan shall be deemed to be substantially consummated under sections 1101 and 1127(b) of the Bankruptcy Code. The Effective Date occurred on January 31, 2019.
- b. *Distributions.* All distributions shall be made in accordance with the terms of the Plan and Confirmation Order on the dates and in the manner provided therein.
- c. *Resolution of Disputed Claims.* Unless an alternate deadline is provided under the Plan or Confirmation Order or has been set by order of this Court, it is anticipated that the Trustee will object to or consensually resolve all Disputed Claims on or before the date that is one hundred eighty (180) days after the Effective Date, subject to the extension of any claim objection deadlines by order of the Court.
- d. *Resolution of Avoidance Actions.* As of the Effective Date, the Debtors had not filed any Avoidance Actions. The Trustee anticipates commencing or consensually resolving any and all Avoidance Actions on or before the date that is two (2) years after the Petition Date, subject to the extension or tolling of any applicable statutes of limitation.
- e. *Pending Appeals.* There are no pending appeals.
- f. *Resolution of Adversary Proceedings.* As of the Effective Date, there are no pending adversary proceedings. The Trustee anticipates commencing or consensually resolving any and all Retained Causes of Action on or before the date that is two (2) years after the Petition Date, unless the subject statute

of limitation provides additional time in which to commence such action, subject to the extension or tolling of any applicable statutes of limitation.

2. The dates referred to in the timetable are based on the Trustee's good faith estimates and are subject to change. In accordance with Local Rule 3021-1(b), the Trustee will present an amended version of the Order containing any material revisions to the timetable contained herein.

3. The entity responsible for safeguarding and accounting for proceeds of recoveries on behalf of the Trust is the Trustee. In the event the Trust retains a disbursing agent or other professional charged with safeguarding or accounting for proceeds of recoveries on behalf of the Trust, the Trustee will present an amended version of this Order disclosing the identity of the additional responsible entity or entities pursuant to Local Rule 3021-1(b).

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. This Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.

Dated: February __, 2019
New York, New York

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE